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July 14, 2025

VIA ECF

Honorable Judge Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Ins. Co., et al. v. Tristate Psychology, et al.*
Case No.: 23-cv-04091-RER-LB

Dear Judge Reyes:

As the Court is aware, we represent Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company, and GEICO Casualty Co. (collectively “Plaintiffs” or “GEICO”) in the above-referenced matter. Plaintiffs, together with Defendants Nazim Tariverdiev (“N. Tariverdiev”), Kianan Tariverdiev (“K. Tariverdiev”), Vladislav Stoyanovsky (“Stoyanovsky”), Dmitriy Khavko (“Khavko”), Dislhod Islamov (“Islamov”), Eduard Pakoys (“Pakoys”), and Financial Vision Capital Group II LLC (“Financial Vision”)(collectively, “Defendants”)(collectively, with Plaintiffs, the “Parties”), respectfully submit this joint letter to update the Court on the status of this action as required by recently retired Magistrate Judge Bloom. See Dkt. Order Dtd. May 14, 2025.

As the Court may be aware, there is a related criminal proceeding with respect to various defendants K. Tariverdiev, N. Tariverdiev, and Islamov. Due to the related criminal proceeding, and the Parties’ prior joint motion to extend discovery was granted and fact discovery is extended through September 12, 2025. Presently, the remaining portions of fact discovery include party and non-party depositions. While the Parties have started conducting non-party depositions, there is a factual dispute between the Parties interpreting regarding Magistrate Judge Bloom’s prior docket Order dated May 14, 2024. The Parties submitted a joint letter on June 11, 2025 (D.E. 81), which was submitted to Magistrate Judge Bloom. However, the Parties have learned that Magistrate Judge Bloom retired and a new Magistrate Judge has not yet been assigned to this matter. As such, the Parties are waiting for the Court to assist the resolution of the discovery disputes set forth in the Parties’ joint letter (See D.E. 81).

We thank the Court for its attention to this matter.

Very truly yours,

RIVKIN RADLER LLP
/s/ Ashley Prinz
Ashley Prinz, Esq.

cc: Counsel of record (via ECF)